

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

MATTHEW STEVENS, individually and on
behalf of all persons similarly situated,

Plaintiff,

v.

USA TODAY SPORTS MEDIA GROUP,
LLC, et al.,

Defendants.

Civil Action No. 1:24-cv-00483-MSN-LRV

JOINT DISCOVERY PLAN

Plaintiff Matthew Stevens (“Plaintiff”) and Defendants USA Today Sports Media Group, LLC and Gannett Co., Inc. (“Defendants”) (collectively the “parties”), by their respective counsel, and pursuant to the Court’s May 16, 2024 Minute Entry, submit this joint status report.

Following the Court’s grant of conditional certification, the Parties have further conferred regarding discovery relating to the Opt-In Plaintiffs.

Based on the current discovery close deadline of September 13, 2024, the Parties propose the following discovery plan related to Opt-In Plaintiffs:

a. The scope of written discovery shall be limited to five document requests and five interrogatories to each Opt-In Plaintiff.

b. Because the 90-day Opt-In Period is expected to close at the end of August, any Opt-In Plaintiff who joins the collective within 30 days or less of the discovery close deadline shall be required to provide written discovery responses by the earlier of the September 13, 2024 discovery close deadline or two business days before any scheduled deposition date, without regard to the time permitted for such responses in the Federal or Local Rules.

- c. Depositions of any Opt-In Plaintiff shall be limited to a period of three hours.
- d. Because Opt-In depositions must commence during the Notice Period, Defendants agree to limit the number of depositions to the greater of 15 total Opt-In depositions, or 30% of the number of total Opt-In Plaintiffs.
- e. The Parties agree to produce expert reports as provided in the Scheduling Order, and to provide any supplemental disclosures within 10 business days of the close of the Opt-In Period.

Respectfully submitted,

/s/ Christine M. Costantino

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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of May 2024, I electronically filed the foregoing Joint Status Report with the Clerk of the Court for the Eastern District of Virginia using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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